

FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management Solid Waste Section

UNIT	UNIT TYPE:													
Lined MSWLF	LC	D	YW	Tra	ansfer		Compost		SLAS		COUNTY: Alamance			
Closed MSWLF			White goods	I	Incin X		T&P		FIRM		PERMIT NO.: 01-02			
CDLF	Tire T Collec		Tire Monofill		lustrial andfill		DEMO		SDTF		FILE TYPE: COMPLIANCE			

Date of Audit: <u>05/03/11</u> **Date of Last Audit:** <u>7/01/10</u>

FACILITY NAME AND ADDRESS:

Stericycle, Inc. 1168 Porter Avenue Haw River, North Carolina 27258

GPS COORDINATES: **N**: 36.06564 **E**: 79.34915

FACILITY CONTACT NAME AND PHONE NUMBER:

Alan Skrzypczak, Facility Manager 336-578-8901 ext.24 or 336-578-8904

email address: askrzpczak@stericycle.com

FACILITY CONTACT ADDRESS:

SAME

AUDIT PARTICIPANTS:

Alan Skrzypczak, Stericycle, Inc. – Facility Manager Chris Marriott, NCDENR - SWS

STATUS OF PERMIT:

Original Permit Issued: January 31, 1991 Permit Modification Issued: January 9, 1998

Permit Renewal (Name change & Revised Operation Plan): September 15, 2003

Permit Review Date: September 15, 2008

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S):

None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

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STATUS OF PAST NOTED VIOLATIONS:

None

AREAS OF CONCERN AND COMMENTS:

- 1) The facility contact phone number has changed since the last inspection completed on July 1, 2010.
- 2) The facility is a medical waste treatment operation consisting of two incinerators.
- 3) The site typically operates 24 hours per day in 2-12 hour shifts, 7 days per week. Exceptions to this schedule are for scheduled maintenance and repair down time. At the time of this inspection, incinerator unit #2 was not operating. The reason for the down time was for scheduled maintenance.
- 4) The facility accepts non-hazardous waste consisting of regulated medical waste, unregulated medical waste, controlled substances seized by law enforcement, chemotherapeutic waste, health care industry documents, USDA-APHIS international waste, and pharmaceuticals.
- 5) The facility operations plan was reviewed during this inspection.
- 6) Permit review date was September 15, 2008. A request for review was made by Stericycle, Inc. on October 27, 2008.
- 7) The Division of Air Quality issued a Title V air permit (# 05896T18) on February 7, 2011. The permit is effective until its expiration on January 31, 2016. A compliance inspection was completed by the Division of Air Quality on March 3, 2011. No violations were found during the March 3, 2011 inspection.
- 8) Continuous monitoring and recording of chamber temperatures and the pH of the quench tank are completed by a circular chart recorder.
- 9) The facility operating records were checked. A detailed review of daily operating records for April 29, 2011 was completed. The chart recorders indicated that temperatures exceeded the minimum of 1200 degrees F. for the primary chamber, and 1800 degrees F. in the secondary chamber during operations of both incinerator units. On April 29, 2011, load rates for unit #1 ranged from 1704 to 1910 lbs/hour. On the same day, the unit #2 load rates ranged from 1700 to 1908 lbs/hr. Both of these load rates are below the permit maximum of 1911 lbs/hr.
- 10) A check of the readouts during the visit indicated temperatures of 2070 degrees F in the upper and 1557 degrees F in the lower chamber of unit #1. These temperatures are above the minimum operating temperatures for each chamber.
- 11) According to Mr. Skrzypczak, the maintenance being completed on unit #2 is part of a routine maintenance that occurs every 7-8 weeks. The maintenance log and checklist was reviewed and discussed.
- Ash generated by the incinerator is processed through a water squelch, then transferred to a 20 yard container, dewatered, and hauled by Republic Waste to Upper Piedmont Landfill in Rougemont, NC. The facility generally fills 2 of the 20 yard containers each operating day. All containers are dewatered under cover and drained into the floor drains.
- Drain water from the ash is collected via floor drains and is piped to the pre treatment/water reuse system for the squelch or diverted to the City of Graham WWTP. The facility holds an Industrial User Pretreatment Permit issued by the City of Graham on July 1, 2006. This Industrial User Permit expires on June 30, 2011. An application for renewal was submitted to the City of Graham in December 2010.
- The facility samples the ash for pH, free liquids, and TCLP constituents (excluding herbicides and pesticides) listed in US EPA manual SW-846 twice a year.
- Ash was sampled for the complete parameter list on November 11, 2010. The samples were sent to NC certified laboratories in Huntersville, NC and Asheville, NC. The results indicated that all

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- TCLP concentrations were below hazardous levels, the pH of the ash was reported as 7.1, and the paint filter test indicated that there were no free liquids.
- Due to prior results indicating levels of lead that may be hazardous, the facility takes additional ash samples analyzed only for lead twice a year. The most resent lead only sampling events occurred on August 11, 2010 and February 15, 2011. The TCLP result was both events was reported below the hazardous regulatory limit of 5.0 mg/L, allowing for continued disposal of the ash in a NC Subtitle D landfill.
- 17) The Annual Facility Report was discussed. Please continue to report with the self generated spreadsheet as the facility has done in previous years.

Please contact me if you have any questions or concerns regarding this audit report.

Chris Marriott

Environmental Senior Specialist

Regional Representative

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Phone: 336-771-5090

Cc(via email): Jason Watkins, Central District Supervisor Donald Herndon, Compliance Officer